Small Business Administration

Privacy Impact Assessment

For

8a Small Disadvantaged Business Management Information System

September 8, 2005

Privacy Impact Assessment Authorization
Memorandum

I have carefully assessed the Privacy Impact Assessment for the 8aSDB Management Information System. This document has been completed in accordance with the requirements of the E-Government Act of 2002.

MANAGEMENT CERTIFICATION – Please check the appropriate statement.

_____ The document is accepted.

_____ The document is accepted pending the changes noted.

_____ The document is not accepted.

_____**We** fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.

Albert Stubblefield, AA, Business Development   _____
System Manager   DATE

_____   _____
OCIO/Project Representative   DATE

Frank Lalumiere, DADA, GC/BD_____   _____
Program/Office Head   DATE

_____   _____
OCIO   DATE

Lisa Babcock, Chief FOI/PA   _____
Chief FOI/PA   DATE

Delorice Ford, AA, OHAA   _____
Senior Official for Privacy   DATE

Name of Project: 8(a) Small Disadvantaged Business Management Information System
Program Office: Government Contracting & Business Development
Project's Unique ID: 028-00-01-03-01-3004-00-301-093

A. CONTACT INFORMATION:

1. **Who is the person completing this document?**

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2. **Who is the system owner?**

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3. **Who is the system manager for this system or application?**
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4. **Who is the IT Security Manager who reviewed this document?**
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5. **Did the Chief FOI/PA review this document?**
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6. **Did the Agency's Senior Office for Privacy review this document?**
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   Agency Senior Privacy Official
   delorice.ford@sba.gov
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7. **Who is the Reviewing Official?**

Delorice Ford
Agency Senior Privacy Official
delorice.ford@sba.gov
(202) 205-7340

B. SYSTEM APPLICATION/GENERAL INFORMATION:

1. **Does this system contain any information about individuals? Yes**

   (a) **Is this information identifiable to the individual? Yes**

   (If there is **NO** information collected, maintained, or used that is identifiable to the individual in the system, <u>the remainder of the Privacy Impact Assessment does not have to be completed past this section.</u> **Note:** <u>Clearance sheet must be signed and copies to IT Security and Chief FOI/PA must be provided</u>).

   (b) **Is the information about individual members of the public? Yes**

   (If YES, a PIA must be submitted with the OMB Exhibit 300, and with the IT Security C&A documentation).

   (c) **Is the information about employees? No**

   (If yes and there is no information about members of the public, the PIA is required for the SBA IT Security C&A process, but is not required to be submitted with the OMB Exhibit 300 documentation).

2. **What is the purpose of the system/application?**

The purpose of this 8a Small Disadvantaged Management Information System (8a SDB MIS) is to provide an integrated management information system that will allow firms owned and controlled by economically and socially disadvantaged persons to submit applications electronically, update annual review information electronically for continuing eligibility and migrate all outdated systems off the mainframe to a web based internet system. Overall the internet-based system will automate all of the material business processes of the 8(a) Business Development (BD) Program These business processes include certification of eligible firms under Section 8(a) of the Small Business Act and as small disadvantaged businesses (SDBs); processing of annual reviews of 8(a) program participants to determine continuing eligibility, and maintain a database of records and eligibility criteria.

Key components of the 8aSDB MIS include: (a) processing of applications for 8(a) and SDB certification (FY 2004); (b) processing of 8(a) annual reviews (FY 2005); (c) automation of all material business processes (e.g., contract support, management and technical assistance, surplus property, joint ventures, and mentor-protégé agreements) and capture/production of tracking and evaluation information as by-

products of execution of business processes; (d) flexible databases that allows for the collection and manipulation of all data required by statute and regulation, as well as one that can be easily modified to accommodate future reporting requirements; (e) business development data collection and storage and interface capability and communication exchange with SBA resource partners and participants; and (f) ad hoc reporting capability.

3. What legal authority authorizes the purchase or development of this system/application?

§§7(j), 8(a) and 8(d) of the Small Business Act of 1953 (Public Law 85-536) as amended.

C. DATA in the SYSTEM:

1. Generally describe the type of information to be used in the system and what categories of individuals are covered in the system?

The electronic 8aSDB MIS (8aSDB MIS) is an initiative undertaken in pursuant to the President's Management Agenda for E-Government under the auspices of the Integrated Acquisition Environment (IAE). The 8aSDB MIS will support the 8(a) Business Development Program and the Small Disadvantage Business Program. It will eliminate the utilization of three systems Contractor Tracking System (CTS), SDBTS, SACS/MEDCOR) that are currently operating into one fully functional system. This system will also provide the automation of many business processes and eliminate the need for repetitive task such as mailings, letters. The system will provide online form building and processing, content management, auto-email capabilities.

Small Business owners will benefit from the 8aSDB MIS as a result of shorten processing and approval rates. The SBA will benefit from labor intensive tasks being eliminated which will allow resources to be redeployed to areas requiring additional attention**.**

2. What are the sources of the information in the system?

(a) Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?

All information is provided by individuals. The initial information is provided into the Central Contractor Registry (CCR) and uploaded within 72 hours. The respondent is then provided a Transaction Personal Identification Number (TPIN) which is utilized to enter the 8aSDB MIS.

(b) What Federal agencies are providing data for use in the system?

Central Contractor Registry (CCR) which is managed by GSA and is a component of the Integrated Acquisition Environment that is controlled by the U.S. Department of Defense and provides initial data for use in the system.

(c) What State and local agencies are providing data for use in the system?

None

(d) From what other third party sources will data be collected?

Data will be collected from the Central Contractor Registration (CCR). This system is managed by the U.S. Department of Defense under the IAE.

(e) What information will be collected from the employee and the public?

Name, Birth Date, Address, Tax ID Number, SSN, EIN, Email Address, Primary North American Industry Classification Code (NAIC), Date the firm was established, Type of Business, 2 Years Tax information (Business & Personal), Ethnicity, Gender, Duns Number, Business Legal Structure, Ownership Percentage, Net Worth, Owners Net Compensation, Business Revenues, Business Liabilities, and Business Assets**.**

3. **Accuracy, Timeliness, and Reliability**

(a) How will data collected from sources other than SBA records be verified for accuracy?

Data received from CCR is subject to internal logic edits and error checks.

(b) How will data be checked for completeness?

The data uploaded from CCR contains logical edits and error checks that ensure completeness of data. The SBA system also contains logical edits and error checks that prevent the submission of data in the application or annual review update that is incomplete.

(c) Is the data current?

Data from CCR is received on a daily basis.

(d) What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models).

The CCR system provides ongoing maintenance and logical edits to ensure that data is complete and correct.

(e) Are the data elements described in detail and documented?

Data elements are described in detail and documented in the "8aSDB MIS Data Dictionary".

D. ATTRIBUTES OF THE DATA:

1. **Is the use of the data both relevant and necessary to the purpose for which the system is being designed?**

   Yes, the 8(a) Program Participation is based on eligibility and is included in the Small Business Act (Public Law 85-536).

3. **Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?**

   The system will not derive new data or create previously unavailable data about an individual through aggregation from the information collected.

3. **Will the new data be placed in the individual's record?**

   Not Applicable. (See 2a above).

4. **Can the system make determinations about employees/public that would not be possible without the new data?**

   Not applicable.

5. **How will the new data be verified for relevance and accuracy?**

   Each year program participants are required to submit current documentation for continuing eligibility in the 8(a) Program.

6. **If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?**

   SBA maintains and operates internal security controls and authentication. These security controls ensure that data is fully secured against unauthorized access and prevent the loss of confidentiality and integrity, as well as, modification or destruction of data.

7. **If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access?**

   SBA maintains Internal Management Controls through periodic auditing from the Office of the Inspector General and the Office of Program Review. Certification and Accreditation of the system is provided by the Chief Information Office and includes a System Security Plan, Risk Assessment, and

Security Test & Evaluation, every three years for existing systems and each time the system is upgraded or enhancement.

8. **How will the data be retrieved?** Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.

   Yes, each participant is given a TPIN for access into the 8aSDB MIS. Each approved participant is also assigned an SBA case number as an internal identifier. SBA employees are given access and roles for access such as administrative, approval, legal, and field staff user.

9. **What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

   The following reports may be produced on individuals:

   Congressional District
   Location
   NAIC Code
   Contract Awards
   Ethnicity
   Gender
   Revenues
   Net Worth

This information is provided to Congress in the annual Report to Congress on Minority Capital Ownership Development as required by the Small Business Act Of 1988 [15 U.S.C. 636(j) 16(A) &(B)].

This information may also be requested under the Freedom of Information Act. However, distinct identifiers such as Name, EIN, SSN etc, are redacted to alleviate disclosure of private information.

10. **What opportunities do individuals have to decline to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses and how individuals can grant consent.)**

   Individuals do have the opportunity to decline information or consent as a criteria for acceptance and continuing eligibility in the SBA Business Development Program.

E. <u>**MAINTENANCE AND ADMINISTRATIVE CONTROLS:**</u>

1. **If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?**

The system is operated from one site. However, access is provided from numerous sites.

2. What are the retention periods of data in this system?

Retention of the information provided is indefinite. Upon completion of the nine year program participation term all data relating to the participant is archived in the system indefinitely.

3. What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?

Not applicable.

4. Is the system using technologies in ways that the SBA has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?

No. The system uses the internet to capture information on small business owners. This system will automate existing processes.

5. How does the use of this technology affect public/employee privacy?

This system does not affect public/employee privacy due to the utilization of a secure web site and authentication controls.

6. Will this system provide the capability to identify, locate, and monitor individuals

No, the system will not provide the capability to identify, locate, or monitor individuals.

7. What kinds of information are collected as a function of the monitoring of individuals?

Not applicable.

8. What controls will be used to prevent unauthorized monitoring?

Not applicable

9. Under which Privacy Act systems of records notice does the system operate? Provide number and name.

The BD Management Information System operates under Privacy Act 30 for the Serving and Contracting System/Minority Enterprise Development Central Repository.

10. **If the system is being modified, will the Privacy Act system of records notice require amendment or revision?**

No, the Privacy Act system of records notice will not require amendment or revision.

F. **ACCESS TO DATA:**

1. **Who will have access to the data in the system?** (E.g., contractors, users, managers, system administrators, developers, tribes, other)

Users include the following:

a.) Officials of SBA, Office of Government Contracting and Business Development, that is responsible for reviewing, and approving small businesses into the SBA Business Development Program.

2. **How is access to the data by a user determined?** Are criteria, procedures, controls, and responsibilities regarding access documented?

   Access will be limited by User ID's, password controls, and the assignment of a responsibility profile to all User ID's. The system will have predetermined access roles and responsibilities for each user. Access will be granted to screens, functions and reports based on an individual's role and responsibility in application processing and approvals. Access will be provided by SBA Office of IT security upon receipt of a written authorization and approval of an SBA manager with specified authorization approval levels.

3. **Will users have access to all data on the system or will the user's access be restricted?**

   User access will be limited to screens, reports and data corresponding to the assigned system responsibility of the user. Managers have control over assigned responsibilities, through authorized system administrators.

4. **What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?** (Please list processes and training materials)

   Assignment of Responsibility profiles to all User ID's limits access by control of User ID/Password which effectively limits misuse or unauthorized browsing of data by those having access. Training on Privacy Act rules and prohibitions on the dissemination or use of non-public information is mandatory and ongoing for SBA staff and contractors. Agency network log-on procedures mandate a posted Privacy notice be viewed and acknowledged prior to entry. SBA Privacy Act System of Records defines routine uses of this information and serves as a control by defining acceptable uses.

5. **Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system**? If yes, are Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?

   Yes, contractors are involved in the design, development, and maintenance of the system. Yes, clauses are inserted into contracts that protect privacy and other sensitive data.

6. **Do other systems share data or have access to the data in the system? If yes, explain.**

   No other systems have access to the data in the system.

7. **Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**

Within the agency, the Office of Government Contracting and Business Development is responsible for assuring proper use of the data in the system. The Office of the Chief Information Office is responsible for the security of the system.

8. **Will other agencies share data or have access to the data in this system (Federal, State, Local, Other)?**

   Not Applicable.

9. **How will the data be used by the other agency?**

   Not Applicable.

10. **Who is responsible for assuring proper use of the data?**

    Within the agency, the Office of Government Contracting and Business Development is responsible for assuring proper use of the data in the system. The Chief Information Office is responsible for the security of the system.